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*Attorneys for Defendant Renown Health*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LUCERO SANCHEZ,

Plaintiff,

vs.

RENOWN HEALTH, a non-profit Nevada  
Corporation, and DOES 1-20, inclusive,

Defendants.

Case No.: 3:21-cv-00352-MMD-WGC

**JOINT REQUEST FOR CASE  
MANAGEMENT CONFERENCE**

Defendant, RENOWN HEALTH (“Defendant”), by and through its attorneys, and Plaintiff, LUCERO SANCHEZ (“Plaintiff”), by and through her attorneys, hereby jointly request a status conference to address unexpected difficulties related to Defendant’s retrieval of some electronically stored information (“ESI”) ordered by this Court and the effect on the current dispositive motion deadline. (ECF No. 54). Specifically, Defendant produced emails responsive to Plaintiff’s Request for Production No. 24 seeking emails to or from Jessi Cohen by the deadline set by the Court. However, Defendant has been unable to restore and produce emails responsive to Plaintiff’s Request for Production Nos. 26 and 27 seeking emails to or from Christina Vargas because the tapes on which the ESI are stored are encrypted. Defendant has not been able to locate the encryption key for two tapes that covered the relevant time period. Defendant has requested a third tape on an

1 expedited basis from Iron Mountain but its arrival date is not currently known. Counsel for both  
2 parties are available on Monday, March 20, 2023, if the Court has availability to conduct a short  
3 case management conference addressing this unexpected issue.

4 DATED this 14 day of March 2023.

DATED this 14 day of March 2023.

SIMONS HALL JOHNSTON PC

7 /s/ Arthur J. Bayer, Jr.,

/s/ Sandra Ketner

8 Arthur J. Bayer, Jr., Esq.  
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9 Reno, Nevada 89511

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*Attorney for Defendant*

11 /s/ Luke Busby

12 Luke Busby, Esq.  
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**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of SIMONS HALL JOHNSTON PC, over 18 years of age, and that on this date I caused to be served a true copy of the foregoing **REQUEST FOR CASE MANAGEMENT CONFERENCE** on all parties to this action by the method(s) indicated below:

X I hereby certify that on the date below, I electronically filed the foregoing with the Clerk of the Court by using the ECF system which served the following registered parties electronically:

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*Attorneys for Plaintiff*

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct, and that this declaration was executed on March 14, 2023.

/s/ Kelly Lee  
An Employee of Simons Hall Johnston PC

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